

1. The statement of basis for the permit does not include a Compliance Assurance Monitoring (CAM) analysis for 40 CFR Part 64. Pursuant to 40 CFR 70.6(a)(3)(A) and District Rule 1203(D)(1)(c)<sup>1</sup>, the Title V permit is required to have monitoring that meets the requirements of Part 64. The statement of basis must be revised to include a CAM applicability analysis and, if applicable, the permit must be revised to include CAM. Please be advised that the definition of an emission limit subject to CAM includes work practice standards and is not limited to numerical emission limits. Should the permit need to be revised to include CAM, then the permit would be subject to the applicable public notice requirements before being issued.
2. The permit does not adequately provide the method of compliance as required by District Rule 1203(D)(1) and 40 CFR 70.6(a)(3). For example, Part III.D.1 lists multiple compliance options for the owner/operator. The permit must be revised to specifically identify the method of compliance being used by the source. Consistent with 40 CFR 70.6(a)(3)(A), if more than one monitoring or testing requirement applies, then the requirements may be streamlined. Without revision, it is expected that the source is performing all of the monitoring, recordkeeping and reporting requirements listed in Part III.D.1.

The condition in Part III.D.3 seems to indicate that “emissions averaging” is the compliance method used by the owner/operator. This condition is not clear as to whether the permit requires the owner/operator to comply with 40 CFR 63.5710 or “something similar”. The permit should specifically identify the requirements of §63.5710, if those are the requirements the source must meet.

3. The statement of basis needs to be revised to identify which type(s) of boat manufacturing operations take place at this facility and, as a result, are subject to the applicable MACT requirements:

(a) Open molding resin and gel coat operations (including pigmented gel coat, clear gel coat, production resin, tooling gel coat, and tooling resin).

(b) Closed molding resin operations.

(c) Resin and gel coat mixing operations.

(d) Resin and gel coat application equipment cleaning operations.

(e) Carpet and fabric adhesive operations.

---

<sup>1</sup> It is noted that the District’s rule does not specifically identify that Part 64 is required; however, at a minimum a permit issued under Part 70 must contain the items listed in 40 CFR 70.6.

(f) Aluminum hull and deck coating operations, including solvent wipedown operations and paint spray gun cleaning operations, on aluminum recreational boats.

[40 CFR 63.5689]

Currently, the permit only provides requirements for operations listed in (a) and (d) above. The statement of basis must be updated to specify that the source is only subject to Subpart VVVV for these types of operations. Otherwise, the permit should be updated to reflect all operations at the facility.

4. The permit does not adequately provide the method of compliance for 40 CFR 63 Subpart WWWW as required by District Rule 1203(D)(1) and 40 CFR 70.6(a)(3). While the owner/operator may use compliance with Subpart VVVV, in lieu of compliance with WWWW, several steps are necessary to achieve this [40 CFR 63.8757(d)]:
  - a. The statement of basis must identify that the owner/operator is complying with Subpart WWWW by showing compliance with Subpart VVVV.
  - b. The statement of basis must demonstrate that this method does not result in any organic HAP emission increase compared to complying with Subpart WWWW.
  - c. The applicable permit compliance conditions that cite Subpart VVVV must also cite Subpart WWWW.

If the owner/operator is not using Subpart VVVV for compliance with Subpart WWWW, then the permit must include the monitoring provisions necessary to demonstrate compliance with Subpart WWWW.